

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**BRENDA FUENTES**

§  
§  
§  
§  
§

**CR. NO. 7:19-CR-02341**

**DEFENDANT'S  
"UNOPPOSED"  
MOTION FOR CONTINUANCE OF  
PRE-TRIAL & JURY SELECTION DATES**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES BRENDA FUENTES**, defendant in the above entitled and numbered cause, by and through her attorney **RUDY MORENO**, and respectfully moves the Court to reset the Pre-Trial and Jury Selection dates in this cause and would show the Court as follows:

**I.**

This case is presently set for Pre-Trial on February 3, 2020 at 2:00 p.m., and Jury Selection on February 6, 2020, at 9:00 a.m., before this Honorable Court.

**II.**

Defendant's counsel is respectfully requesting a continuance of the pre-trial and jury selection dates. The undersign counsel is commencing a felony trial in the 389<sup>th</sup> District Court of Hidalgo Count on January 28, 2020 (*State of Texas vs. Leonel Adame; Docket Number: CR-0408-18-H; Charge(s): Intoxication Manslaughter w/ a Vehicle*). Trial is expected to last two (2) weeks.

Moreover, undersign counsel will need addition time (after trial is completed) to review the Government's plea offer with Defendant.

**III.**

AUSA Amy Lynn Greenbaum is “Unopposed” to the Court granting Defendant’s request.

**IV.**

This Motion is not made for purposes of delay but only so that justice may be done and to provide defendant the effective assistance of counsel.

**WHEREFORE, PREMISES CONSIDERED**, Defendant prays unto the Court this Motion for Continuance be granted and the present Pre-trial and Jury Selection dates be re-set as respectfully requested.

Respectfully Submitted,

**/S/RUDY MORENO**

**RUDY MORENO**

**State Bar No. 24102807**

**Federal I.D. No. 3102324**

**LAW OFFICES OF RUDY MORENO**

**5526 North 10th Street**

**McAllen, Texas 78504**

**(956) 682-9477 Telephone**

**(956) 682-0223 Facsimile**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 27<sup>th</sup> day of January, 2020, I filed a Motion to Continue the Pre-Trial and Trial dates with the Clerk of the Court & provided a copy of such filing to all counsel of record.

**/S/RUDY MORENO**

**RUDY MORENO**

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have spoken with the AUSA Amy Lynn Greenbaum in reference to Defendant **BRENDA FUENTES'** Motion for Continuance.

**/S/RUDY MORENO**  
**RUDY MORENO**